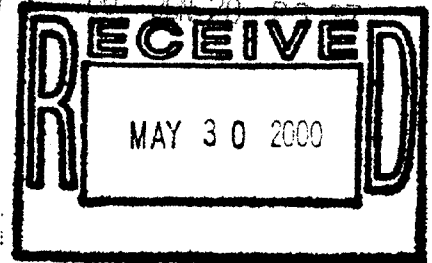




**Standard
Process®**

May 15, 2000

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The Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C. Street S.W.
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) Each nutrient in Arginex provides a natural aid to help the kidneys remove metabolic byproducts and toxins from the blood.
- (2) Arginex keeps your blood cleaner and promotes healthy blood vessels.
- (3) Oat flour contains niacin, lecithin, and vitamin E to assist in removing residual fats from the blood. Buckwheat contains rutin to help keep arterial vessels healthy. The tissue of the Tillandsia plant can help promote healthy blood sugar levels. Beets support blood purification.
- (4) Arginex keeps your heart healthy.
- (5) Beets and oats help strengthen the heart muscle and improve circulation to help maintain vascular health.
- (6) Arginex supports renal function.
- (7) The nutrients in Arginex work to help the kidneys remove metabolic waste from the blood.
- (8) Contains distinctive enzyme complexes from buckwheat juice and seed, peavine juice, oat flour, liver and beet root with a special yeast strain of Rhizopus oryzae to support the cleansing ability of the kidneys.

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These statements are made for a dietary supplement containing a proprietary blend of dried buckwheat juice, buckwheat (seed), dried pea (vine) juice, oat flour, bovine liver, beet (root), extract of *Rhizopus oryzae* grown on *Tillandsia usneoides* and beet (root), dried beet (leaf) juice, and ascorbic acid. Other ingredients include honey, calcium stearate, vitamin A palmitate, and gelatin. The name of the product is Arginex®.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden
Standard Process Inc.

